



**National Headquarters**

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October 3, 2011

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Robin Kelly  
Senior Campaign Finance Analyst  
Report Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Reference: Defenders of Wildlife Action Fund (C90007907) FEC Form 5, received 10/12/2010

Dear Ms. Kelly:

Thank you for your letter dated September 2, 2011, requesting that Defenders of Wildlife Action Fund provide you with additional information regarding its FEC Form 5 filed on 10/12/2010. Specifically, you questioned why we did not report any contributor information and asked us to amend the report to provide the missing information.

There is no missing information to report. Commission regulations require persons other than political committees to include on their independent expenditure reports "the identification of each person who made a contribution in excess of \$200 to the person filing such report, **which contribution was made for the purpose of furthering the reported independent expenditure.**" 11 CFR 109.10(e)(1)(vi) (emphasis added). Neither the statute nor the regulations require us to report all donations we receive in excess of \$200.

We are required to report contributor information only with respect to contributions we receive that are given for the purpose of funding the reportable independent expenditures. I can attest that Defenders of Wildlife Action Fund did not solicit any funds for the purpose of furthering the reported independent expenditures nor did we receive any such funds. As a result, we were not required to provide any itemized contributor information on the form in question.

Please be assured that we are mindful of our reporting obligations under the Commission's regulations, and when we do receive funds from an individual in excess of \$200 for the purpose of furthering a reportable independent expenditure, we dutifully provide the required information on the applicable independent expenditure report.

I trust this letter addresses your concerns, but please do not hesitate to contact me should you have any further questions.

Thank you.

William J Lutz  
Senior Director  
Defenders of Wildlife Action Fund